

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION)	MDL 2804
OPIATE LITIGATION)	
)	Case No. 1:17-md-2804-DAP
This document relates to:)	
)	Judge Dan Aaron Polster
All Cases Noted on Attached Exhibit)	

**SUPPLEMENT TO MASTER STIPULATION AND ORDER DISMISSING WITH
PREJUDICE CLAIMS PURSUANT TO ALABAMA ENDO SETTLEMENT
AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, "Dismissing Plaintiffs") [**Doc No. 4553-1**] and Defendants Endo Health Solutions Inc., Endo Pharmaceuticals Inc., Endo International plc, Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc. (collectively, "Endo and Par Defendants"¹) that, pursuant to the election of each Dismissing Plaintiff to participate in the Endo Settlement Agreement attached hereto as Appendix B [**Doc 4553-2**], all claims of each Dismissing Plaintiff against any Endo or Par Defendant are hereby voluntarily DISMISSED WITH PREJUDICE, with each party to bear its own costs.

¹ The Endo Settlement Agreement is between the State of Alabama, Office of Attorney General on the one hand and Endo Health Solutions Inc. and Endo Pharmaceuticals Inc. on the other, but the Endo Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all "Releasees," which include not only Endo Health Solutions Inc., Endo Pharmaceuticals Inc., Par Pharmaceutical, Inc.; and Par Pharmaceutical Companies, Inc, but also each of the respective parents, members, divisions, direct and indirect subsidiaries, joint ventures, predecessors, successors, affiliates, agents (but only in their capacity as such), assigns, insurers (but only in their capacity as such), and current and former employees, officers, directors, members, shareholders (but only in their capacity as such), partners, trustees, and any current or former related companies of any of the foregoing entities. Endo Settlement Agreement §§A(p) & D.1 (attached as Appendix B). To the extent the parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

Dated: June 27, 2022

Respectfully submitted,

/s/ Sara M. Turner

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[Plaintiff signature Blocks]

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